

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

FILED

2011 APR 20 PM 2:51

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASBY Fm
DEPUTY

UNITED STATES OF AMERICA) SEALED
V.) NO.
JORGE RAMIREZ-PEREZ, aka "Enano")

EP11CR0932

GOVERNMENT'S MOTION TO DETAIN DEFENDANT
WITHOUT BOND AND MOTION FOR CONTINUANCE

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and pursuant to 18 U.S.C. § 3142(e) and (f), files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

1. The Defendant has been charged with a violation of Title 8, United States Code, Section 1324, Alien Smuggling. This charge is a deportable offense under immigration law.
2. The Defendant has a prior criminal history.
3. The Defendant is a foreign national, and, as such, presents a high risk of fleeing to avoid prosecution on this charge.
4. There are no conditions or combination of conditions which will reasonably assure the safety of the community should Defendant be released on bond.
5. There are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant at future court settings.

The Government would further move the Court for a three day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

JOHN E. MURPHY
UNITED STATES ATTORNEY

BY:



PATRICK GARCIA

Assistant U.S. Attorney

Texas Bar # 24053947

700 E. San Antonio, Suite 200

El Paso, Texas 79901

(915) 534-6884